



CHARMAINE TAVARES
MAYOR

OUR REFERENCE
YOUR REFERENCE

POLICE DEPARTMENT

COUNTY OF MAUI

55 MAHALANI STREET
WAILUKU, HAWAII 96793
(808) 244-6400
FAX (808) 244-6411
February 19, 2008



THOMAS M. PHILLIPS
CHIEF OF POLICE

GARY A. YABUTA
DEPUTY CHIEF OF POLICE

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: FCC Docket No. 08-4, Hawaiian Telcom Petition for Waiver of
High-cost Universal Support Rules

Dear Ms. Dortch:

As representatives of the Public Safety Answering Point (PSAP) in Hawaii, we would like to comment on Hawaiian Telcom's Petition for Waiver of High-cost Universal Support Rules. Hawaiian Telcom's petition would allow it to receive federal support and modernize its telecommunication network. We believe granting this petition would have a positive impact on the services that the PSAP provides.

Public safety is critical to the State of Hawaii. Hawaiian Telcom states in its petition that Hawaii's unique geography and island characteristics make it challenging and costly to provide service to the entire state. The PSAP believes that it faces many of these challenges as well. All emergency personnel will benefit from a strengthened communication network; from the PSAP to the first responders, to the emergency room medical staff. Communication is vital to this line of work.

As an island state in the middle of the Pacific Ocean, there are more than 2,000 miles separating it from the continental United States. Because of the geographic isolation, other states cannot be relied upon for support or assistance. Hawaii truly relies upon its own resources and is limited by these resources when needed. During disasters and state of emergencies, coordination of state and county resources is a top priority and necessitates the need for communication links to all islands.

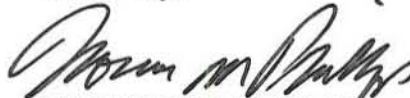
The only Level II trauma center in the State of Hawaii is located in the urban core of Honolulu on the island of Oahu. As a result, all life threatening injuries occurring on other islands require medical air transport to this location. Communication between Oahu and the other islands is an integral part of victims receiving timely life-saving treatment.

Strengthening the network by increasing redundancy would be beneficial in times of major disasters such as hurricanes, earthquakes and tsunamis since it would improve Hawaiian Telcom's ability to maintain service during these times and shorten restoration times. Redundancy of circuits and communications links to all areas of the state will maximize the effectiveness of the E911 system for use by all residents.

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
February 19, 2008
Page 2

Communication to the PSAP is essential. Having increased redundancy would increase the resiliency of the E911 system. The PSAP will benefit from Hawaiian Telcom's use of universal service funds to strengthen its network. For these reasons, we urge the Commission to grant Hawaiian Telcom's petition.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Phillips", written over the printed name.

THOMAS M. PHILLIPS
Chief of Police

cc: Assistant Chief Clayton Tom